

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DEC 27 2007

MAGISTRATE JUDGE SCHENKIER
CRIMINAL COMPLAINT

ROY LEE GOODMAN, JR.

MICHAEL W. DOBBINS CASE NUMBER
CLERK, U. S. DISTRICT COURT 07 CR 0868
UNDER SEAL

(Name and Address of Defendant)

I, Special Agent Christopher Soyez, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

On or about December 24, 2007, at Chicago, in the Northern District of Illinois, Eastern Division, defendant:

knowingly committed a robbery and committed and threatened physical violence to a person in furtherance of said robbery, which robbery obstructed, delayed, and affected commerce, as the terms "robbery" and "commerce" are defined in Title 18, United States Code, Section 1951, in that the defendant did obtain cash and checks during a robbery of a Dunbar Armored Car carrier, violation of Title 18, United States Code, Section 1951

On or about December 24, 2007, at Chicago, in the Northern District of Illinois, Eastern Division, defendant

knowingly used and carried a firearm during and in relation to a crime of violence, for which the defendant may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1951, in violation of Title 18 United States Code, Section 924(c)(1)(A) and 2.

I further state that I am a Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHED.

FILED

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No


DEC 27 2007


MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT
Christopher Soyez, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

December 27, 2007
Date

at


Chicago, Illinois
City and State

Sidney Schenkier, U.S. Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

AFFIDAVIT

I, Christopher M. Soyez, being duly sworn on oath, hereby depose and say:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed for approximately one and one-half years. I am currently assigned to the Chicago Division's South Resident Agency, during which time I have participated in numerous bank robbery investigations. The statements in this affidavit are based upon my participation in this investigation and information I have received from witnesses and other law enforcement officers, including other Special Agents of the FBI and detectives with the Calumet City Police Department who aided in the investigation of below-described armored car robbery.

2. The information contained in this affidavit is not an exhaustive account of everything I know about this case. Rather, it contains only those facts necessary to establish probable cause to believe that on December 24, 2007, Roy Lee Goodman, Jr. both committed the offense of armed robbery of an armored car carrier, in violation of Title 18, United States Code, Section 1951, and did knowingly posses, carry, brandish, and fire a firearm during the commission of the armored car robbery, a crime of violence, in violation of Title 18, United States Code, Sections 924 (c)(1)(A) and

2.

December 24, 2007 Robbery of Dunbar Armored Car Carrier

3. On December 24, 2007, law enforcement officers responded to a robbery of a Dunbar Armored Car that occurred at approximately 11:41 a.m., at the JC Penney located at 200 River Oaks Center, Calumet City, Illinois 60409 (the "Robbery").

4. Shortly after the robbery, law enforcement officers, among other things, interviewed a number of witnesses and the victim, and reviewed surveillance video. As a result, a detailed account and time line of the Robbery was obtained.

5. At approximately 11:40 a.m., two JC Penney employees and a Dunbar Armored Car carrier, carrying a bag, entered the East Entrance Package Pickup elevator on the second floor of JC Penney. Already in the elevator was a black male, approximately 40 years of age, 6'0"-6'1" with a medium build, clean shaven, pock-marked face, salt and pepper hair, and wearing a navy blue pea coat with a black baseball cap, a gold sweatshirt, blue jeans, and boots, later identified as Roy Lee Goodman, Jr. At this point, Goodman, Jr. was at the right, front corner (when inside the elevator), standing behind a wheelchair and had a tube of wrapping paper in or near his right hand. The wheelchair did not contain a person, rather there was a red box located on the seating area. The Dunbar Armored Car carrier was standing at the left, front corner (when inside the elevator) and the two JC Penney employees were standing in the back of the elevator, facing its doors. The two JC Penney employees, the Dunbar Armored Car carrier, and the black male rode the elevator from the second floor down to the first floor. During this elevator ride, Goodman, Jr. remarked "this is a busy time of year" and mentioned that he had to take his mother to the mall last year, as well.

6. As the elevator car approached the first floor (prior to the point it reached the first floor), Goodman, Jr. brought his left hand to the tube in or near his right hand, maneuvered the tube so it was pointing at the Dunbar Armored Car carrier and fired at least two shots with a gun that was hidden in the tube of wrapping paper. The gunshots hit the Dunbar Armored Car carrier in the left hand, upper right forearm and the lower abdomen. Upon being shot, the carrier dropped the bag he was carrying and fell to the ground but did not lose consciousness. Goodman, Jr. then stated, "Don't move or I will kill you." At that point, the elevator doors opened, and Goodman, Jr. exited

the elevator with the paper tube of wrapping paper and the bag dropped by the Armored Car Carrier. Goodman, Jr. left the wheelchair and the red box in the elevator. Goodman, Jr. then walked through the first floor of JC Penney.

Identification of Roy Lee Goodman, Jr. as Robber

7. Law enforcement agents obtained surveillance video from JC Penney, showing numerous areas of the store, including the East Entrance Package Pickup elevator entrance, and the first and second floors. This video indicated a young, black male standing near the entrance of the East Entrance Package Pickup elevator on the second floor, minutes before the Dunbar Armored Car carrier and two JC Penney employees entered that elevator at that location. The young, black male, later identified as Roy Lee Goodman III waved to the surveillance camera while he stood outside the elevator.

8. Upon viewing this footage during the course of the investigation into the robbery, a JC Penney employee recognized the young, black male, Roy Lee Goodman III, as a former employee of JC Penney. Another JC Penney employee viewed the surveillance video and also identified the young, black male as a former employee of JC Penney, Roy Lee Goodman III.

9. Using this lead, law enforcement agents ran the name Roy Lee Goodman III through various databases. As a result, it was determined that Roy Lee Goodman III lives at 5623 Maywood Avenue, Hammond, Indiana along with a Roy Lee Goodman, Jr. Law enforcement databases established that Roy Lee Goodman, Jr. is a 45 year-old black male, approximately 6'2" with a medium build, pock-marked face, similar to the eye witness descriptions given by the Dunbar Armored Car carrier and two JC Penney employees and as found in the JC Penney surveillance video from December 24, 2007 at or near 11:40 a.m. Photographs of both Roy Lee Goodman III and Roy Lee Goodman, Jr. were obtained from law enforcement databases to be used for photographic

lineups. It was also determined that Roy Lee Goodman, Jr. was convicted of being a felon-in-possession-of-a-firearm, charged with armed robbery.

10. On December 27, 2007, law enforcement agents showed a six person color photo array to the Dunbar Armored Car carrier. The carrier positively identified the individual depicted in photograph #4 which is Roy Lee Goodman, Jr. as the individual responsible for shooting him on December 24, 2007 inside the elevator at JC Penney, 200 River Oaks Center, Calumet City, Illinois.

11. On December 27, 2007, law enforcement agents showed a six person color photo array to one of the JC Penney employees that entered the East Entrance Package Pickup elevator on the second floor of JC Penney with the Dunbar Armored Car carrier. The employee positively identified the individual depicted in photograph #4 which is Roy Lee Goodman, Jr., as the individual responsible for the shooting on December 24, 2007 inside the elevator at JC Penney, 200 River Oaks Center, Calumet City, Illinois.

12. It was discovered that Roy Lee Goodman, Jr. took approximately \$259,695.43 in cash and \$65,619.65 in checks, contained in the bag he took from the Dunbar Armored Car carrier.

13. Based on the above, Affiant submits that there is probable cause to believe that Roy Lee Goodman Jr. did, on December 24, 2007, knowingly commit a robbery and commit and threaten physical violence to a person in furtherance of said robbery, which robbery obstructed, delayed, and affected commerce, as the terms "robbery" and "commerce" are defined in Title 18, United States Code, Section 1951, in that the defendant did obtain cash and checks during a robbery of a Dunbar Armored Car carrier, in violation of Title 18, United States Code, Section 1951. In addition, Affiant submits that there is probable cause to believe that Roy Lee Goodman Jr. did, on December 24, 2007 knowingly used and carried a firearm during and in relation to a crime of violence, for which the defendant may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1951, in violation of Title 18 United States Code, Section 924(c).

FURTHER AFFIANT SAYETH NOT.


CHRISTOPHER SOYEZ, Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO BEFORE ME
this 27th day of December, 2007.


SIDNEY I. SCHENKIER
UNITED STATES MAGISTRATE JUDGE